

SHEEHAN PHINNEY

Manchester, NH | Concord, NH | Hanover, NH | Boston, MA

Bradford E. Cook, Esq.
Direct Dial: 603-627-8110
bcook@sheehan.com

Reply to: Manchester Office
1000 Elm Street, PO Box 3701
Manchester, NH 03105-3701

November 26, 2018

Ms. Tammy Wright, Clerk
New Hampshire Senate
State House
107 N. Main Street
Concord, New Hampshire 03301

Re: Complaint of Susan Olsen re Senator-elect Jon Morgan, Case BLC 2018-5

Dear Clerk Wright,

As Chairman of the New Hampshire Ballot Law Commission, I am writing to you regarding a vote taken by the Commission at its meeting this morning. The first item on the agenda was BLC 2018-5, the above-captioned complaint, filed with the Commission, regarding the qualifications of Senator-elect Jon Morgan, asserting that he does not meet the Constitutional qualifications for holding that office. After consultation with counsel, the Commission voted unanimously to refer the matter to the New Hampshire Senate for whatever action it may wish to take. This was done due to the Constitution's provision that the Senate is the final judge of the election and qualifications of its members (Part II, Article 35).

Accordingly, enclosed find the documents filed with the Commission on this matter:

1. Complaint letter of Susan Olsen, dated November 2, 2018, with attachments.
2. E-mail from me to Susan Olsen dated November 5, 2018.
3. Letter of Senator Bill Gannon dated November 8, 2018.
4. Letter from me to Jon Morgan dated November 9, 2018, with a copy of the complaint filed by Susan Olsen.
5. Letter from Senator Gannon dated November 22, 2018 withdrawing 3 above.
6. Filing on behalf of Jon Morgan dated November 25, 2018, by Attorneys Paul Twomey and William Christie, with attachments.
7. Additional materials submitted at hearing today by Susan Olsen.

As stated, the Ballot Law Commission made no finding and expresses no opinion on any of these materials, which are referred to the Senate under its Constitutional jurisdiction over the qualification of its own members.

Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Bradford E. Cook". The signature is written in a cursive style with a large, sweeping initial "B".

Bradford E. Cook
Chairman

New Hampshire Ballot Law Commission

Enclosures

Cc: Ms. Susan Olsen

Jon Morgan

Paul Twomey, Esq.

Lisa English, Esq., Office of the NH Attorney General

Hon. William M. Gardner, Secretary of State

(without enclosures)